UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

v.

Mag. No. 19-1578 (DEA)

MICHAEL REIMER,

a/k/a "Miguel Reimer," a/k/a "White Mike"

I, James N. McCaffery, being duly sworn, state that the following is true and correct to the best of my knowledge and belief. On or about the dates set forth in Attachment A to this complaint, in the District of New Jersey and elsewhere:

SEE ATTACHMENT A

I further state that I am a Special Agent with the Federal Bureau of Investigation, and that this complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached pages and made a part hereof.

James N. McCaffer

SPECIAL AGENT

FEDERAL BUREAU OF INVESTIGATION

SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE SEPTEMBER 27, 2019 TRENTON, NEW JERSEY

HON. DOUGLAS E. ARPERT

United States Magistrate Judge

ATTACHMENT A

On or about July 12, 2019, in Mercer County, in the District of New Jersey and elsewhere, the defendant,

MICHAEL REIMER, a/k/a "Miguel Reimer," a/k/a "White Mike,"

did knowingly and intentionally possess with intent to distribute 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

ATTACHMENT B

- I, James N. McCaffery, have been a Special Agent with the Federal Bureau of Investigation ("FBI") since 2003. The information contained in this complaint is based on my review of documents and other evidence obtained during the investigation, as well as my discussions with other law enforcement officers with knowledge of the investigation. Because this complaint is being submitted for the limited purpose of establishing probable cause, it does not include every fact that I have learned during the course of the investigation.
- 1. Between in or around April 2019 and in or around July 2019, law enforcement conducted an investigation into suspected drug trafficking in and around Trenton, New Jersey, and elsewhere. During the investigation, which included physical surveillance, law enforcement identified defendant MICHAEL REIMER, a/k/a "Miguel Reimer," a/k/a "White Mike" ("REIMER"), as an individual engaged in unlawful narcotics distribution. During its surveillance of REIMER, law enforcement observed REIMER on multiple occasions engage in conduct consistent with hand-to-hand narcotics transactions.
- 2. On or about July 12, 2019, law enforcement officers established physical surveillance of REIMER's residence located in or around Roebling, New Jersey. Officers observed REIMER exit the residence and get into a silver Honda Pilot (the "Honda") registered in his name. Officers observed that the Honda had heavily tinted front windows, in violation of New Jersey law.
- 3. Officers followed REIMER as he drove the Honda north to in or around Fort Lee, New Jersey, and toward the George Washington Bridge ("GWB"); the officers lost visual contact of the Honda as it headed toward New York. Shortly thereafter, officers positioned themselves near the GWB and observed REIMER return from New York to New Jersey in the Honda. Based on their training and experience, the prior surveillance of REIMER, and REIMER's brief trip to New York, officers suspected that REIMER had traveled to New York to obtain a supply of narcotics.
- 4. Thereafter, officers stopped the Honda and requested that REIMER, who was the vehicle's only occupant, get out. A trained narcotics canine arrived and positively alerted to the likely presence of narcotics located in the Honda. Thereafter, law enforcement obtained a warrant to search the Honda and, pursuant to the search, recovered approximately 675 bricks¹ of suspected heroin located in a secret compartment installed below the center console of the Honda.

A "brick" of heroin typically contains approximately 50 smaller, individually packaged glassine envelopes or baggies containing heroin, which are bundled together in "bundles" of approximately ten envelopes or baggies, which are then wrapped and taped to form a small package, referred to as a brick. A brick typically contains a total of approximately one gram of heroin

5. Chemical testing confirmed that the substance recovered from the Honda contained more than 100 grams of a substance containing a detectable amount of heroin.